

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, §
RICHARD KING, FRED WALLACE, §
LAVAR SANTEE, and MARVIN RAY §
YATES, individually and on behalf of §
those similarly situated, §
Plaintiffs, §
§
v. § CIVIL ACTION NO. 4:14-CV-1698
§
§
BRYAN COLLIER, in his official §
capacity, ROBERTO HERRERA, in his §
official capacity, and TEXAS §
DEPARTMENT OF CRIMINAL §
JUSTICE, §
Defendants. §

**DEFENDANTS' FOURTH VERIFIED STATUS REPORT REGARDING AIR
CONDITIONING AT TDCJ FACILITIES HOUSING
CLASS MEMBERS: OCTOBER 27, 2020**

KEN PAXTON Attorney General of Texas	TED A. ROSS Assistant Attorney General Attorney-in-Charge State Bar No. 24008890 Southern District ID No. 22658 <i>Ted.Ross@oag.texas.gov</i>
BRENT WEBSTER First Assistant Attorney General	CHARLES K. ELDRED State Bar No. 00793681 Special Litigation Counsel
RYAN L. BANGERT Deputy First Assistant Attorney General	BENJAMIN DOWER State Bar No. 24082931 Assistant Attorney General
DARREN L. MCCARTY Deputy Attorney General for Civil Litigation	JEANINE COGGESHALL State Bar No. 24083162 Assistant Attorney General
ELIZABETH BROWN FORE Chief, Administrative Law Division	
SHANNA E. MOLINARE Chief, Law Enforcement Defense Division	
Office of the Attorney General P.O. Box 12548 Austin, Texas 78711-2548 512-463-2080 • fax 512-370-9069	

Defendants, Bryan Collier and Robert Herrera, in their official capacities, and the Texas Department of Criminal Justice (Defendants), by and through the Office of the Attorney General, file this Fourth Verified Status Report Regarding Air Conditioning at TDCJ Facilities Housing Class Members. Included with this court filing are the verified temperature logs from September 1-30, 2020 and October 1, 2020 to October 15, 2020, for all locations within TDCJ where class members may be housed.

Dated: October 27, 2020.

Respectfully Submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant Attorney General

DARREN McCARTY
Deputy Attorney General for Civil Litigation

ELIZABETH BROWN FORE
Chief, Admiistrative Law Division

SHANNA E. MOLINARE
Chief, Law Enforcement Defense Division

/s/ Ted A. Ross
TED A. ROSS
State Bar No. 24008890
Assistant Attorney General

CHARLES K. ELDRED
State Bar No. 00793681
Special Litigation Counsel

BENJAMIN DOWER
State Bar No. 24082931
Assistant Attorney General

JEANINE COGGESHALL
State Bar No. 24083162
Assistant Attorney General

Office of the Attorney General of Texas
P. O. Box 12548, Capitol Station
Austin, Texas 78711
P: (512) 475-4191
F: (512) 457-4674
Ted.Ross@oag.texas.gov
Charles.Eldred@oag.texas.gov
Benjamin.Dower@oag.texas.gov
Jeanine.Coggeshall@oag.texas.gov

ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on October 27, 2020

/s/ Ted. A. Ross
Ted A. Ross
Assistant Attorney General

CERTIFICATE OF SERVICE

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served on all counsel of record via electronic mail on October 27, 2020, as authorized by Fed. R. Civ. P. 5(b)(2) and in accordance with the electronic case filing procedures of the United States District Court for the Southern District of Texas.

/s/ Ted. A. Ross
Ted A. Ross
Assistant Attorney General